

# **Exhibit E**

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARK SOKOLOW, et al.,

Plaintiffs,

Civ. No. 04-397 (GBD) (RLE)

v.

THE PALESTINE LIBERATION ORGANIZATION, et al.,

Defendants.

**THE BAUER PLAINTIFFS' SECOND SET OF INTERROGATORIES**  
**(Interrogatory No. 2)**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure and the Local Rules of this Court, Plaintiffs Dr. Alan J. Bauer, Revital Bauer, Yehonathon Bauer, Binyamin Bauer, Daniel Bauer and Yehuda Bauer ("Plaintiffs"), by counsel, serve the Defendants the Palestinian Authority ("PA") and the Palestine Liberation Organization ("PLO") with the following interrogatories, which Defendants shall answer under oath and in writing within thirty days of the service of these interrogatories.

**INSTRUCTIONS AND GENERAL DEFINITIONS**

1. Defendants shall respond to these interrogatories as required by the Federal Rules of Civil Procedure and the Local Rules of this Court.
2. The full text of the definitions and rules of construction set forth in Local Civil Rule 26.3(c) and (d) is incorporated by reference herein and governs these interrogatories.

**SPECIFIC DEFINITIONS**

1. "PA" means and refers to defendant The Palestinian Authority and any ministry, agency, division, bureau, department or instrumentality thereof.

2. “PLO” means and refers to defendant The Palestine Liberation Organization and any agency, division, bureau, department or instrumentality thereof.

3. “Defendants” means and refers collectively to Defendants PA and PLO and any ministry, agency, division, bureau, department or instrumentality thereof.

4. “Hashaika” means and refers to the Mohammed Hashaika who is mentioned in the First Amended Complaint (“FAC”) in this action and who died as a result of the March 21, 2002 bombing discussed in the FAC.

5. “Relevant Knowledge” means and refers to any knowledge of: (i) any arrest and/or detention of Hashaika by the PA; and/or (ii) any custodial interrogation of Hashaika by the PA; and/or (iii) the causes and/or circumstances of Hashaika’s release from PA custody.

### **INTERROGATORIES**

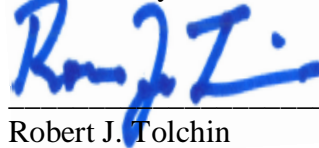
#### **Interrogatory No. 2**

List every past and current employee of the PA and/or the PLO (“Employee”) who has any Relevant Knowledge and for each such Employee provide: (1) the Employee’s full name and identification number; (2) the nature and scope of the Employee’s Relevant Knowledge; (3) the origins and sources of the Employee’s Relevant Knowledge; (4) all positions and/or jobs held by the Employee in the PA and/or the PLO and any and all work or employment performed by the Employee for the PA and/or the PLO at the time(s) the Employee acquired the Relevant Knowledge; (5) all positions and/or jobs currently held by the Employee in the PA and/or the PLO and any and all work or employment currently performed by the Employee for the PA and/or the PLO, including without limitation a detailed description of: (i) the titles, nature, purposes, responsibilities and duties of any and all such positions, jobs, work and/or employment; (ii) the ministries, agencies, divisions, bureaus, departments and/or

instrumentalities of the PA and/or PLO in and/or for which the Employee performs such positions, jobs, work and/or employment; (iii) the rank or ranks held by the Employee in all such positions, jobs, work and/or employment; and (iv) the names, titles and positions of all officials and/or employees of the PA and/or the PLO to whom the Employee is directly or indirectly subordinate in all such positions, jobs, work and/or employment.

October 3, 2011

Plaintiffs, by their Attorney,

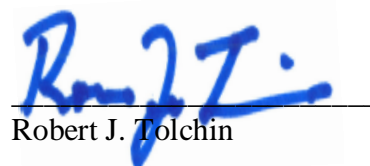


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**CERTIFICATION**

I hereby certify that on October 3, 2011, I served the within by electronic mail and United States mail on the counsel listed below.

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